

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

REBECCA TERRY,

Plaintiff,

Case No. 17-CV-1112

v.

COUNTY OF MILWAUKEE, *et al.*,

Defendants.

COUNTY DEFENDANTS' MOTION FOR LEAVE TO FILE OVERSIZED BRIEF

Defendants Milwaukee County, Richard Schmidt, Brian Wenzel, Carolyn Exum, Morgan Bevenue and Margaret Hoover (hereinafter "County Defendants"), by their attorneys, Leib Knott Gaynor LLC, hereby move the Court to allow them to file an oversized reply brief in support of their motion for summary judgment. In support of this motion, County Defendants submit the following:

1. On September 24, Plaintiff filed her Omnibus Response in Opposition to Defendants' Motions for Summary Judgment (ECF Doc. No. 177) and various supporting documents (ECF Doc Nos. 178-185), in accordance with the Court's July 2, 2018 Order (ECF Doc. No. 147) granting the County Defendants' motion for an extension of time to file dispositive motions and setting briefing deadlines.

2. Local Rule 56(b)(8)(A) states that the page limit for a reply memorandum in support of summary judgment must not exceed fifteen (15) pages.

3. Due to the number of claims made, the number of defendants named in the amended complaint, and the number of proposed findings of fact submitted by plaintiff, the County

Defendants' Reply Brief in Support of Summary Judgment exceeds 15 pages. The County Defendants therefore request leave of the Court to exceed the page limitation.

4. Plaintiff's Amended Complaint contains four (4) counts, ninety-two (92) paragraphs, and allegations against six (6) County Defendants.

5. Plaintiff's Statement of Facts contains one hundred and thirty-four (134) proposed findings of fact. (ECF Doc. No. 179).

6. Each of the claims against the County Defendants are distinct and require significant analysis in order to adequately present the facts and law.

7. Good cause exists for extending the limitations number of pages contained in the reply memorandum in support of motion for summary judgment.

8. The County Defendants have made their best effort to keep the reply memorandum in support of summary judgment concise given the breadth of material covered.

9. Counsel certifies pursuant to Local Rule 7(a)(2) that no papers or affidavits will be filed in support of this motion.

WHEREFORE, the County Defendants respectfully request the Court to grant their motion for leave to file an oversized reply brief in support of Defendants' motion for summary judgment.

Dated this 28th day of September, 2018.

LEIB KNOTT GAYNOR LLC

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